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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

(HONORABLE JANIS L. SAMMARTINO)

UNITED STATES OF AMERICA, Plaintiff, v. **LUIS BRAVO-GONZALEZ,** Defendant.	CASE NO. 07CR3157-JLS DATE: April 11, 2008 TIME: 1:30 p.m. NOTICE OF MOTIONS *IN LIMINE* AND MOTIONS *IN LIMINE*: 1) TO EXCLUDE ALL DEPORTATION DOCUMENTS; 2) TO PROHIBIT EVIDENCE UNDER FED. R. EVID. 404(B) AND 609; 3) TO EXCLUDE WITNESSES (A-FILE CUSTODIAN); 4) TO ALLOW ATTORNEY-CONDUCTED VOIR DIRE; 5) TO PROHIBIT WITNESSES FROM REFERRING TO MR. BRAVO-GONZALEZ AS "THE ALIEN"; 6) PRODUCE GRAND JURY TRANSCRIPTS; 7) TO PRECLUDE EXPERT TESTIMONY; AND 8) ALLOW LEAVE TO FILE FURTHER MOTIONS.

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY; AND
STEVEN DESALVO, ASSISTANT UNITED STATES ATTORNEY:

PLEASE TAKE NOTICE that on April 11, 2008 at 1:30 p.m., or as soon thereafter as counsel may be heard, the defendant, Luis Bravo-Gonzalez, by and through his attorneys, Shaffy Moeel and Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the motions *in limine* listed below.

MOTIONS *IN LIMINE*

Luis Bravo-Gonzalez, the defendant in this case, by and through his attorneys, Shaffy Moeel and Federal Defenders of San Diego, Inc., pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law and local rules, hereby moves this Court for an order to:

1. exclude deportation documents;
2. prohibit evidence under Fed. R. Evid. 404(b) and 609 evidence;
3. exclude witnesses (A-file Custodian);
4. allow attorney-conducted *voir dire*;
5. prohibit witnesses from referring to Mr. Bravo-Gonzalez as "the alien"
6. produce grand jury transcripts;
7. preclude expert testimony; and
8. to allow leave to file further motions.

These motions are based upon the instant motions and notice of motions *in limine*, the attached statement of facts and memorandum of points and authorities, and any and all other materials that may be adduced at the time of the hearing on these motions.

Respectfully submitted,

/s/ Shaffy Moeel

Dated: April 7, 2008

SHAFFY MOEEL
Federal Defenders of San Diego, Inc.
Attorneys for Mr. Bravo-Gonzalez